

SHANNON L. GUSTAFSON (SBN 228856)  
[sgustafson@lynberg.com](mailto:sgustafson@lynberg.com)  
AMY R. MARGOLIES (SBN 283471)  
[amargolies@lynberg.com](mailto:amargolies@lynberg.com)  
**LYNBERG & WATKINS**  
A Professional Corporation  
1100 W. Town & Country Road, Suite #1450  
Orange, California 92868  
(714) 937-1010 Telephone  
(714) 937-1003 Facsimile

Attorneys for Defendant, COUNTY OF SAN BERNARDINO,  
ROBERT VACCARI, and JAKE ADAMS

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CASE NO. 5:22-cv-00949-KK-(SHKx)

*Assigned for All Purposes to:  
Hon. Kenly K. Kato – Courtroom 3*

**DECLARATION OF SHANNON L  
GUSTAFSON IN SUPPORT OF  
OPPOSITION TO PLAINTIFF'S  
MOTION IN LIMINE #1 TO  
EXCLUDE DECEDENT'S  
CRIMINAL HISTORY**

Date: May 15, 2025  
Time: 9:30 a.m.  
Courtroom: 3

*Trial Date: June 2, 2025*

*Complaint filed: 06/07/2022  
FAC filed: 10/18/22  
SAC filed: 01/13/23  
TAC filed: 05/12/23*

L.C., a minor by and through her  
guardian *ad litem* Maria Cadena,  
individually and as successor-in-interest  
to Hector Mr. Puga; I.H., a minor by  
and through his guardian *ad litem*  
Jasmine Hernandez, individually and as  
successor-in-interest to Hector Mr.  
Puga; A.L., a minor by and through her  
guardian *ad litem* Lydia Lopez,  
individually and as successor-in-interest  
to Hector Mr. Puga; and ANTONIA  
SALAS UBALDO, individually,

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY  
OF SAN BERNARDINO; S.S.C., a  
nominal defendant; ISIAH KEE;  
MICHAEL BLACKWOOD;  
BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS;  
and DOES 6-10, inclusive,

Defendants.

**DECLARATION OF SHANNON L. GUSTAFSON**

I, Shannon L. Gustafson, do state and declare as follows:

1. I am an attorney at law duly licensed to practice before this Court and am a shareholder in the law firm of Lynberg & Watkins, P.C., attorneys of record for Defendants County of San Bernardino, Robert Vaccari, and Jake Adams in the above-captioned matter. I have personal knowledge of the facts stated herein, except those stated upon information and belief, and as to those matters, I believe them to be true. If called upon to testify to the matters herein, I could and would competently do so.

2. Attached hereto as Exhibit "1" is a true and correct copy of Roger Clark's report.

3. Attached hereto as Exhibit "2" is a true and correct copy of the relevant portions of Antonia Salas Ubaldo's deposition.

4. Attached hereto as Exhibit "3" is a true and correct copy of the relevant portions of Jasmine Hernandez' deposition.

5. Attached hereto as Exhibit "4" is a true and correct copy of the relevant portions of Lidia Lopez's deposition.

6. Attached hereto as Exhibit "5" is a true and correct copy of the relevant portions of Maria Cardena's deposition.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this April 24th, 2025, at Orange, California.

/s/Shannon L. Gustafson

Declarant